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**Attorney for Defendant** 

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO CONTINUE TRIAL DATE

Case No.: 3:17-cr-00044-BR-1

## JARED DALE GILLESPIE,

## Defendant.

- I, Thomas E. Price, declare:
- 1. I am the attorney appointed to represent Jared Dale Gillespie, in the above-entitled case.
- 2. A jury trial in this case is currently scheduled for April 11, 2017. Mr. Gillespie was arraigned on February 10, 2017. No continuances have been sought by the defense.

## Page 1 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO CONTINUE TRIAL DATE

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3. Mr. Gillespie has received discovery and the defense is conducting investigation in

his case, including obtaining information relating to circumstances of the offense and

Mr. Gillespie's background. This information relates to pretrial litigation, trial, and sentencing.

Mr. Gillespie therefore respectfully requests that this Court continue his case for a period of

approximately 60 days or more to accomplish these tasks.

4. I have discussed with Mr. Gillespie his right to a speedy trial. He agrees to the

continuance and knows it will result in excludable delay under the provisions of 18 U.S.C.

§ 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Thomas Ratcliffe has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct to the best of my knowledge and belief and that this declaration was executed on

March 14, 2017, in Portland, Oregon.

/s/ Thomas E. Price

Thomas E. Price

Attorney for Defendant